

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:	§	
Greens 126, L.P. and	§	No. 08-36470
Oaks 198, L.P. and	§	No. 08-36471
Trails 240, L.P.	§	No. 08-36472
DEBTOR(S)	§	Chapter 11

**Application of Debtor for Authority to Employ And Enter Into Contract
With Property Consulting Group**

COME NOW, Greens 126, L.P., Oaks 198, L.P., and Trails 240 L.P., Debtors herein, and respectfully request the following:

1. Debtors filed a petition for relief under Chapter 11 of the Bankruptcy Code on October 7, 2008, and are operating their respective businesses of managing and leasing apartments.
2. Debtors annually pay property taxes on the order of \$310,000 for the three properties. The property taxes are based on the tax appraised values of the real estate and improvements.
3. In order to ensure Debtors have taken every reasonable measure to lower their operating costs to improve their opportunity for a successful reorganization, Debtors believe it is reasonable and necessary for them to employ professionals who are in the regular business to challenge tax appraisals in order, at minimum, to be held constant, or on the upside, to get them reduced. Debtors have interviewed a number of providers of these types of services and would suggest to this Court that Property Consulting Group ("PCG"), be authorized to provide the necessary services in the role of property tax consultants. Debtors

feel PCG is well qualified for this work and have selected them as the preferred supplier after interviewing and evaluating other adjusters and their qualifications. The qualifications of PCG are attached as Exhibit A.

4. To the best of the Debtors' knowledge and belief, PCG is disinterested and does not hold or represent any interest adverse to the Debtors' bankruptcy estates, either individually or collectively. Moreover, PCG has no connections with the Debtors, creditors or any other party-in-interest, their respective attorneys and accountants, the United States Trustee or any person employed in the office of the United States Trustee other than as disclosed by PCG in the Verified Statement (Exhibit B) under Bankruptcy Rule 2014 filed contemporaneously herewith.

5. Retention and employment of PCG would be to the material benefit of the Debtors and would give not only short term benefit, but also longer term benefit as the tax base is lowered in terms of year to year percentage increases.

6. The fees which would be charged to Debtors would be in accordance with the contract attached as Exhibit C. Briefly for the Court's benefit, the fees charged are calculated based on the actual achieved savings (the difference between the tax assessment before and after their services have been provided for a particular tax year). The fee is a 15% commission on the actual savings.

7. To date, PCG has not requested nor has it received a retainer post-petition in anticipation of the Court's approval of this Motion to Employ and Enter Into Contract.

8. Any post-petition fees incurred by PCG for Debtors will be paid directly from funds operating funds of the Debtors, which is the subject of a cash collateral agreement previously approved by this Court, and this is understood by PCG. Unless the Court

requests otherwise, Debtors and PCG do not anticipate requesting court approval for payment of their fees consistent with the attached contract.

9. LMREC CDO II REO I ("Legg Mason"), the secured lender on the cash collateral *et al.* does not oppose this Application and approves the employment of PCG to perform the services as outlined in this Application.

WHEREFORE, PREMISES CONSIDERED, Greens 126, L.P., Oaks 198, L.P., and Trails 240 L.P., Debtors herein, pray the Court to authorize the employment and permission to enter into contract with PCG to provide professional consulting services regarding their property taxes consistent with the attached contract.

Respectfully submitted this the 4th day of June, 2009

/s/ Michael Louis Catrett
Michael Louis Catrett
SBN 24049057
ADM 589119
Britt & Catrett, P.C.
4615 S.W. Fwy., Suite 500
Houston, TX 77027
(713) 666-0807
(713) 355-8382 facsimile

Certificate of Service

I, the undersigned, hereby certify that a true and correct copy of the foregoing instrument has been duly served upon the entities listed below by First Class Mail, Postage Pre-paid or by electronic means on this the 3rd day of April, 2009.

U.S. Trustee:

Christine March
United States Trustee
Bob Casey Federal Building
515 Rusk Avenue, Suite 3401

Houston, Texas 77002

Property Consulting Group
2611 FM 1960 Road West, Suite A-102
Houston, TX 77068

Greens 126, L.P.
Oaks 198, L.P.
Trails 240, L.P.
8045 Antoine #189
Houston, TX 77088

A-1 Helium & Balloons 2244 1st Street Rosenberg, TX 77471	Aldine ISD 14909 Aldine Westfield Road Houston, TX 77032-3027
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Apartment Data Services 1500 South Dairy Ashford, Suite 175 Houston, Texas 77077	Apple Pest Control 1422 Yale street Housotn, Texas 77008
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AT&T P. O. Box 600670 Jacksonville, FL 32260	Centerpoint Energy P. O. Box 2628 Houston, TX 77252-2628
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Chao, Koy 5300 West Gulf Bank Road #1404 Houston, Texas 77088	Christine March Untied States Trustee Office Bob Casey Courthouse 515 Rusk St. Houston, TX 77002
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City of Houston, Water Dept. P.O. Box 1560 Houston, TX 77251	Claudia Gomez
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Creative Property Managment, Inc. c/o Allen J. Segal 1200 Briarcrest, Suite 3100 Bryan, TX 77802	Briana Cioni/Peter D'Aprice Stutzman, Bromberg,, Esserman & Plifka 2323 Bryan St. Suite 2200 Dallas, TX 75201
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Direct Energy P.O. Box 650273 Dallas, TX 75265-0273	First Advantage P.O. Box 31462 Tampa Fla 33631-3462
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Harris County et al
c/o John P. Dillman
Linebarger, Goggan
Blair & Sampson
P.O. Box 3064
Houston, Texas 77253-3064

HPES
20202 Highway 59 North #325
Humble, Texas 77338-2402

IRS- Insolvency Division
P. O. Box 21126
Philadelphia, PA 19114

Lee, James
1835 Conestoga Court
Merced, Ca 95348

Lee, Mae Po Sae
5300 West Gulf Bank Road #606
Houston, Texas 77088

Legg Mason Real Estate Capital III
10880 Wilshire Blvd, Suite 1750
Los Angeles, CA 90024

Lion Distributing
POB 565
Reisterstown MD 21136-0565

Marmill Landscaping
P.O. Box 771611
Houston, Texas 77215-1622
Attn. Elizabeth Hanks

O'Connor & associates
2200 North Loop
Houston

Real Page
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Rent.com
2425 Olympic Blvd. Suite 400E
Santa Monica, Ca

Solar Verde
20533 Biscayne Blvd. #765
Aventura, FL 33180

Thomas J. Masenga
Allen Matkins Leck Gamble
Mallory
& Natsis
515 S. Figueroa St., 7th Floor
Los Angeles, CA 90071-3398

Waste Management
PO Box 55409
Houston, Tx 77255-5409

Wilmar Supply
200 East Park Dr. Suite 200
Mt. Laurel, NJ 08054

Ameristar Glass
P.O. Box 29309
Dallas, TX 75229

Apartment Home Living
9430 research Blvd.
Echelon Building II, Suite 100
Austin, Texas 78759

Cyrus N. Ansari/Jared W. Hays
Stutzman, Bromberg,,
Esserman & Plifka
2323 Bryan St. Suite 2200
Dallas, TX 75201

Data Rush Couriers
1298 North Post Oak Rd.
Houston, TX 77055

For Rent . Com
75 Remittance Drive #1711
Chicago, IL 60675-1711

ECG Telephone
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Bartlesville, OK 74005

Houston Multi-Housing
4810 Westway Park Blvd.
Houston, Texas 77041

Kroger, Myers - LLP
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Houston, TX 77027

Legg Mason Real Estate Capital III
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Los Angeles, CA 90024

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Monitronics
8628 Innovation Way
Chicago, IL 60682-0086

Presto Supply
580 North Shepherd
Houston, Texas 77007

Ambit Energy
1801 North Lamar St., Suite 200
Dallas, TX 75202

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Houston, TX 77088

Carol Stream IL 60197-5001

Best Plumbing

Brilliant Promotional
1016 Harwin Dr., Suite 125
Houston, TX 77036

Buena Suerte
P.O. Box 740426
Houston, TX 77274

Captive Audience Marketing
5997 Brockton Ave., Suite B
Riverside, CA 90256

Craven Carpet
P.O. Box 801084
Houston, TX 77280

Creative Consultants
P.O. Box 790867
San Antonio, TX 78279

First Advantage
P.O. Box 31462
Tampa, Fla 33631-3462

Great American
P.O. Box 4422
Houston, TX 77210

GreenSheet
P.O. Box 2025
Houston, TX 77252

Home Depot
PO Box 6029
The Lakes, Nevada 88901-6029

Houston Apartment Association

Houston Multi-Housing
4810 Westway Park Blvd.
Houston, Texas 77041

ICC Paints
same phone # as ICI Paints

ICI Paints
14130 Westheimer
Houston, Texas 77077

Job Target
225 State Street, Suite 300
New London, CT 06320

La Subasta
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Lowes
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Atlanta, GA 30353-0954

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Houston, Texas 77268

Move for Free
8535 Wurzbach, Suite 101
San Antonio, TX 78240

Office Depot
P O Box 9020
Dept. 56-4204887268

Ricoh Customer Group
P. O. Box 730831
Dallas, TX 75373

Royal Chemical Corporation
P.O. Box 1601
Owings Mill, Md 21117

Royal Plumbing
6750 Long Point
Houston, Texas 77055

Saelee, May Poo
5300 West Gulf Bank Road #606
Houston, Texas 77088

South Cross Security
4008 Artdale
Houston, TX 77063

Toyota Financial Services
P.O. Box 650686
Dallas, TX 75265

/s/Michael Louis Catrett